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IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO, Plaintiff, V. BRYAN C. KOHBERGER Defendant.	Case No. CR01-24-31665 STATE'S RESPONSE TO DEFENDANT'S MOTION IN LIMINE #12 RE: MAKE AND MODEL OF SUSPECT VEHICLE

COMES NOW the State of Idaho, by and through the Latah County Prosecuting Attorney, and hereby responds to Defendant's Motion in Limine #12 Re: Make and Model of Suspect Vehicle.

FACTS

On November 13, 2022, Moscow Police Department responded to 1122 King Road (hereafter "crime scene"). Payne Aff. attached as State's Exhibit S-1. Investigators found four

deceased individuals who died from apparent stab wounds. *Id.* at pages 1-2. Investigators canvassed the crime scene area for surveillance footage to identify the person responsible for the homicides. *Id.* at page 5. A surviving roommate, D.M. reported to law enforcement she was woken up around 4:00 a.m. by noises. *Id.* at page 4. Investigators were able to obtain surveillance footage from 1112 King Road, a residence immediately to the northwest of the crime scene. *Id.* That video surveillance picked up audio of "voices or a whimper followed by a loud thud." *Id.* In addition, a dog can be heard barking starting at 4:17 a.m. *Id.* D.M. reported around this time she saw an unknown male in the residence walking towards the rear exit of the residence. *Id.* at pages 4-5. The 1112 King Road video shows a white sedan entering the crime scene area at 4:04 a.m. *Id.* at page 6. This same white sedan is seen departing the crime scene area at 4:20 a.m. at a "high rate of speed." *Id.* at page 6.

Based on this information, investigators focused on identifying the make and model of the white sedan (hereafter "suspect" or "questioned vehicle") seen on the 1112 King Road surveillance. *Id.* at pages 6-7. The suspect vehicle is seen on the 1112 King Road surveillance prior to the homicides (suspect vehicle makes three initial passes by crime scene before entering a fourth and final time) at: 3:30 a.m., 3:33 a.m., 3:38 a.m., 3:40 a.m., 3:56 a.m., and 3:58 a.m., and then at 4:04 a.m. *Id.* at page 6.

Video surveillance capturing the suspect vehicle was collected at additional places near the crime scene prior to the homicides: 1311 S. Main Street also known as Sunset Mart (.6 miles from crime scene at 3:28 a.m.); 1125 Ridge Road (.4 miles from crime scene at 3:29 a.m., and 4:01 a.m.); 1320 Linda Lane (.2 miles from crime scene at 3:29 a.m.); 1330 Linda Lane (.3 miles from crime scene at 3:30 a.m., 3:39 a.m., 3:56 a.m., 4:05 a.m., and 4:07 a.m.); and 451 Paradise Drive (.6 miles from crime scene at 3:35 a.m., and 3:48 a.m.). FBI Report of Special Agent (SA)

Rob Hille, pages 1-10, attached as State's Exhibit S-2; Google Maps, 5 pages attached as State's Exhibit S-3. Investigators were able to review those videos and determine the route of travel. *Id.*

Investigators provided video footage to the Federal Bureau of Investigation (FBI) to determine the year, make, and model of the suspect vehicle on the 1112 King Road surveillance. Payne Aff. at page 7. Forensic Examiner Anthony Imel reviewed multiple videos and still images. According to Imel's Report "the multiple submissions of media were reviewed independently and collectively to identify the questioned vehicle's make, model and year." FBI Report of Special Agent (SA) Anthony Imel attached as State's Exhibit S-4. Of those videos, the 1125 Ridge Road video provided a clear view of the suspect vehicle. Make-Model Chart #3 attached as Exhibit S-5. Imel was able to compare this video to the video from 1112 King Road. *Id.* This video was captured at 4:01 a.m. (approximately 3 minutes prior to the suspect vehicle entering the crime scene at 4:04 a.m.). Hille Report at pages 8-9. Regarding the "questioned vehicle" - the vehicle on the 1112 King Road surveillance - Imel's opinion is:

> [t]he questioned vehicle shares similar class characteristics with a 5th generation Hyundai Elantra between 2014-2016. The similar class characteristics include, but are not limited to the overall body style, window configuration, front grill configuration, headlight shape, side trim, rear brake light configuration, rear license plate position, and rear bumper position. The position of the rear bumper reflector and the shape of the fog lights assisted in narrowing the vehicle year span.

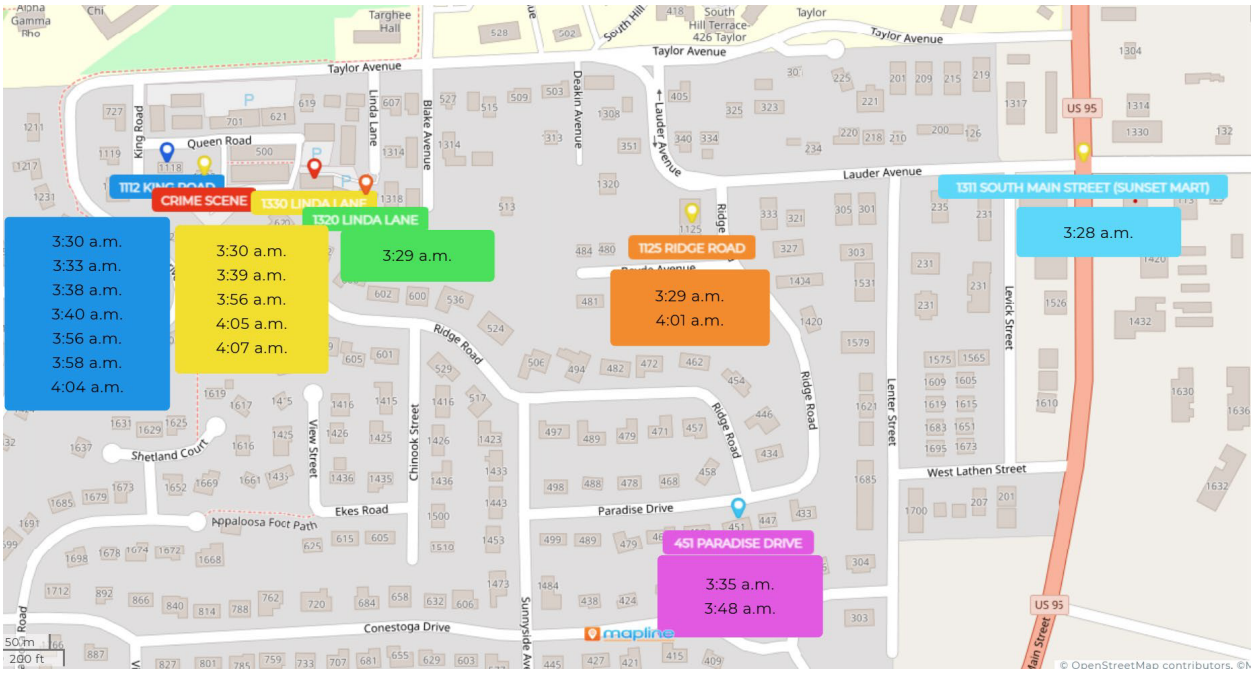
Imel Report at pages 2-3. A white 2015 Hyundai Elantra was registered to the Defendant at the time of the homicides. Washington Vehicle Registration Records attached as State's Exhibit S-6.

ARGUMENT

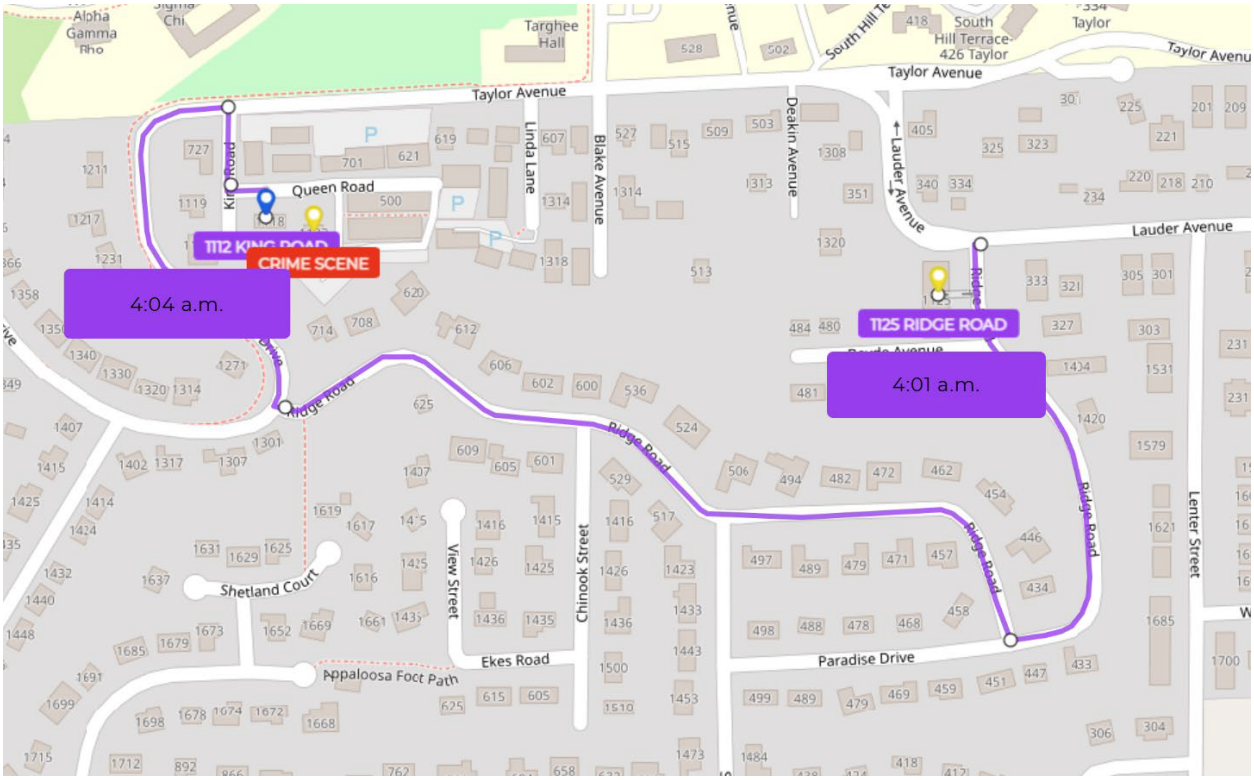
The State's expert regarding vehicle identification, Anthony Imel, should be allowed to explain to the jury his opinion that the "suspect vehicle" on the 1112 King Road surveillance shares similar class characteristics to a 5th generation Hyundai Elantra between 2014-2015.

I. The "suspect vehicle" was identified from surveillance footage from the area of the crime scene.

The Defendant claims that the suspect vehicle "was not identified from surveillance footage in the area of 1122 King Road." Defendant's Motion at page 2. This is simply not true. As stated in Imel's report, "multiple submissions of media were reviewed independently and collectively to identify the questioned vehicle's make, model and year." The suspect vehicle was picked up on multiple occasions at least six separate locations (all within .6 miles from the crime scene) immediately preceding the crimes (i.e. less than one hour) as indicated below:



The videos capture footage in the middle of the night from approximately 3:35 a.m. to 4:07 a.m. when there is light vehicle traffic, especially in Moscow, Idaho. From the review of the surveillance videos, investigators were able to determine the suspect vehicle's path of travel based on the witnessed direction of travel associated with the time stamps. From the review of the 1125 Ridge Road video, which admittedly provides the best view of the suspect vehicle, investigators were able to determine that the suspect vehicle shared similar class characteristics to a 5th generation Hyundai Elantra between 2014-2015. This video was taken at 4:01 a.m. approximately .3 miles from the crime scene. Based on the 1125 Ridge Road surveillance and the other video surveillance, investigators can determine the suspect's path of travel as follows:



It takes approximately three minutes to travel from 1125 Ridge Road to 1112 King Road. A logical application means the vehicle with characteristics of a 5th generation Hyundai Elantra is the same vehicle on the 1112 King Road camera at 4:04 a.m. This same line of reasoning can be

applied to other surveillance videos. The State should be able to introduce all video surveillance surrounding the crime scene preceding the homicides. The State's expert should be able to opine based on his analysis and the surrounding circumstances that the survillance is picking up the same suspect vehicle (which he identified as sharing the same characteristics as a 2014-2015 5th generation Hyundai Elantra).

II. There does not need to be "continuous footage" for this evidence to be admissible.

Defendant argues "there is no continuous footage linking the vehicle at the 1112 King [R]oad footage and that from Ridge [R]oad." Defendant's Motion at page 3. Defendant's argument appears to suggest that because every single business and residence surrounding the crime scene did not have video surveillance the State should be precluded from introducing this evidence. This is illogical. As argued above, the State should be able to introduce all captured video surveillance surrounding the crime scene preceding the homicides. The State's expert should be able to opine based on his analysis and the surrounding circumstances that the survillance is picking up the same suspect vehicle (which he identified as sharing the same characteristics as a 2014-2015 5th generation Hyundai Elantra). This opinion would not be "speculative" as argued, but instead based on logical educated inferences from review of the surveillance videos including observed traffic flow, direction of travel, and time stamps.

III. The identification of the "suspect vehicle" is relevant and admissible.

As the Court has seen in the Defendant's other filings, the Defendant tends to label "bad evidence" for the Defendant as irrelevant and asks this Court to prohibit the State from introducing it. That is not the rule. Under Idaho Rule of Evidence 401, evidence is relevant if "it

has the tendency to make a fact more or less probable than it would be without the evidence; and the fact is of consequence in determining the action." I.R.E. 401. This evidence is clearly relevant as the Defendant owned a 2015 white Hyundai Elantra at the time of the homicides.

Defendant argues pursuant to I.R.E. 403, this relevant evidence should be excluded. The Defendant fails to show how this evidence is unfair, confusing, misleading, would cause delay, waste time, or would be cumulative, much less that the evidence's probative value is "substantially outweighed" by such. While this evidence is prejudicial (relevant evidence tends to be) it is not unfair.

The State anticipates Mr. Imel will testify in accordance with his expert opinion at trial. The State anticipates other State witnesses will refer to the vehicle identified on surveillance footage as a white sedan (or like language). The jury (the factfinder) should be able to hear Mr. Imel's opinion regarding the make and model of the suspect vehicle, weigh this information with other testimony or evidence admitted (including the area video surveillance, Special Agent Hille's testimony as well as what is offered by the Defendant), then decide if they believe the vehicle on the 1112 King Road video (and other area surveillance footage) is a 2014-2015 Hyundai Elantra. They will use this information to ultimately determine if this same vehicle was Defendant's Hyundai Elantra.

CONCLUSION

In conclusion, the State respectfully requests this deny the Defendant's Motion and rule that the State's expert, Anthony Imel, is allowed to testify at trial in accordance with the State's expert disclosure which includes the opinion that the vehicle captured on the 1112 King Road video shares similar class characteristics to a 5th generation Hyundai Elantra between 2014-2015.

RESPECTFULLY SUBMITTED this 17th day of March 2025.

Ashley S. Jennings

ASHLEY S. JENNINGS
SENIOR DEPUTY PROSECUTOR

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the STATE'S REPONSE TO DEFENDANT'S MOTION IN LIMINE #12 RE: MAKE AND MODEL OF SUSPECT VEHICLE was served on the following in the manner indicated below:

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☒ Mailed
☒ E-filed & Served / E-mailed
☐ Faxed
☐ Hand Delivered

Dated this 17th day of March 2025.

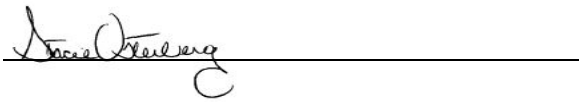

Exhibit A
Statement of Brett Payne

The below information is provided by Brett Payne, who is a duly appointed, qualified and acting peace officer within the County of Latah, State of Idaho. Brett Payne is employed by Moscow Police Department in the official capacity or position of Corporal (CPL) and has been a trained and qualified peace officer for approximately four (4) years. CPL Payne is being assisted by members of the Idaho State Police and agents of the Federal Bureau of Investigation.

On November 13, 2022, at approximately 4:00 p.m., Moscow Police Department (MPD) Sergeant Blaker and I responded to 1122 King Road, Moscow, Idaho, hereafter the "King Road Residence," to assist with scene security and processing of a crime scene associated with four homicides. Upon our arrival, the Idaho State Police (ISP) Forensic Team was on scene and was preparing to begin processing the scene. MPD Officer (OFC) Smith, one of the initial responding officers to the incident, advised he would walk me through the scene.

OFC Smith and I entered the King Road Residence through the bottom floor door on the north side of the building. OFC Smith and I then walked upstairs to the second floor. OFC Smith directed me down the hallway to the west bedroom on the second floor, which I later learned (through Xana's driver's license and other personal belongings found in the room) was Xana Kernodle's, hereafter "Kernodle" room. Just before this room there was a bathroom door on the south wall of the hallway. As I approached the room, I could see a body, later identified as Kernodle's, laying on the floor. Kernodle was deceased with wounds which appeared to have been caused by an edged weapon.

Also in the room was a male, later identified as Ethan Chapin, hereafter, "Chapin". Chapin was also deceased with wounds later determined (Autopsy Report provided by Spokane

STATE'S EXHIBIT
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County Medical Examiner Veena Singh dated December 15, 2022) to be caused by "sharp-force injuries."

I then followed OFC Smith upstairs to the third floor of the residence. The third floor consisted of two bedrooms and one bathroom. The bedroom on the west side of the floor was later determined to be Kaylee Goncalves, hereafter "Goncalves," room. I later learned (from review of Officer Nunes' body camera) there was a dog in the room when Moscow Police Officers initially responded. The dog belonged to Goncalves and her ex-boyfriend Jack Ducoeur. I found out from my interview with Jack Ducouer on November 13, 2022 that he and Goncalves shared the dog. OFC Smith then pointed out a small bathroom on the east side of the third floor. This bathroom shared a wall with Madison Mogen's, hereafter "Mogen" bedroom which was situated on the southeast corner of the third floor.

As I entered this bedroom, I could see two females in the single bed in the room. Both Goncalves and Mogen were deceased with visible stab wounds. I also later noticed what appeared to be a tan leather knife sheath laying on the bed next to Mogen's right side (when viewed from the door). The sheath was later processed and had "Ka-Bar" "USMC" and the United States Marine Corps eagle globe and anchor insignia stamped on the outside of it. The Idaho State Lab later located a single source of male DNA (Suspect Profile) left on the button snap of the knife sheath.

As part of the investigation, numerous interviews were conducted by Moscow Police Department Officers, Idaho State Police Detectives, and FBI Agents. Two of the interviews included B.F., and D.M. Both B.F. and D.M. were inside the King Road Residence at the time of the homicides and were roommates to the victims. B.F.'s bedroom was located on the east side of the first floor of the King Road Residence.

Based on numerous interviews conducted by MPD Officers, ISP Detectives, and FBI Agents as well as my review of evidence, I have learned the following:

On the evening of November 12, 2022, Chapin and Kernodle are seen by B.F. at the Sigma Chi house on the University of Idaho campus at 735 Nez Perce Drive from approximately 9:00 p.m. on November 12 to 1:45 a.m. on November 13. B.F. also estimated that at approximately, 1:45 a.m. Chapin and Kernodle returned to the King Road Residence. B.F. also stated that Chapin did not live in the King Road Residence but was a guest of Kernodle.

Goncalves and Mogen were at a local bar, the Corner Club at 202 N. Main Street, in Moscow. Goncalves and Mogen can be seen on video footage provided by the Corner Club between 10:00 p.m. on November 12 and 1:30 a.m. on November 13th. At approximately 1:30 a.m. Goncalves and Mogen can be seen on video at a local food vendor called the "Grub Truck" at 318 S. Main Street in downtown Moscow. The Grub Truck live streams video from their food truck on the streaming platform Twitch which is available for public viewing on their website. This video was captured by law enforcement. A private party (Eric Grower) reported that he provided a ride to Goncalves and Mogen at approximately 1:56 a.m. from downtown Moscow (in front of the Grub Truck) to the King Road Residence.

D.M. and B.F. both made statements during interviews that indicated the occupants of the King Road Residence were at home by 2:00 a.m. and asleep or at least in their rooms by approximately 4:00 a.m. This is with the exception of Kernodle, who received a DoorDash order at the residence at approximately 4:00 a.m. (law enforcement identified the DoorDash delivery driver who reported this information).

D.M. stated she originally went to sleep in her bedroom on the southeast side of the second floor. D.M. stated she was awoken at approximately 4:00 a.m. by what she stated sounded like Goncalves playing with her dog in one of the upstairs bedrooms, which were located on the third floor. A short time later, D.M. said she heard who she thought was Goncalves say something to the effect of "there's someone here." A review of records obtained from a forensic download of Kernodle's phone showed this could also have been Kernodle as her cellular phone indicated she was likely awake and using the TikTok app at approximately 4:12 a.m.

D.M. stated she looked out of her bedroom but did not see anything when she heard the comment about someone being in the house. D.M. stated she opened her door a second time when she heard what she thought was crying coming from Kernodle's room. D.M. then said she heard a male voice say something to the effect of "it's ok, I'm going to help you."

At approximately 4:17 a.m., a security camera located at 1112 King Road, a residence immediately to the northwest of 1122 King Road, picked up distorted audio of what sounded like voices or a whimper followed by a loud thud. A dog can also be heard barking numerous times starting at 4:17 a.m. The security camera is less than fifty feet from the west wall of Kernodle's bedroom.

D.M. stated she opened her door for the third time after she heard the crying and saw a figure clad in black clothing and a mask that covered the person's mouth and nose walking towards her. D.M. described the figure as 5'10" or taller, male, not very muscular, but athletically built with bushy eyebrows. The male walked past D.M. as she stood in a "frozen shock phase." The male walked towards the back sliding glass door. D.M. locked herself in her

room after seeing the male. D.M. did not state that she recognized the male. This leads investigators to believe that the murderer left the scene.

The combination of D.M.'s statements to law enforcement, reviews of forensic downloads of records from B.F. and D.M.'s phone, and video of a suspect video as described below leads investigators to believe the homicides occurred between 4:00 a.m. and 4:25 a.m.

During the processing of the crime scene, investigators found a latent shoe print. This was located during the second processing of the crime scene by the ISP Forensic Team by first using a presumptive blood test and then Amino Black, a protein stain that detects the presence of cellular material. The detected shoe print showed a diamond-shaped pattern (similar to the pattern of a Vans type shoe sole) just outside the door of D.M.'s bedroom (located on second floor). This is consistent with D.M.'s statement regarding the suspect's path of travel.

As part of the investigation, an extensive search, commonly referred to in law enforcement as a "video canvass," was conducted in the area of the King Road Residence. This video canvass was to obtain any footage from the early morning hours of November 13, 2022, in the area of the King Road Residence and surrounding neighborhoods in an effort to locate the suspect(s) or suspect vehicle(s) traveling to or leaving from the King Road Residence. This video canvass resulted in the collection of numerous surveillance videos in the area from both residential and business addresses. I have reviewed numerous videos that were collected and have had conversations with the other MPD Officers, ISP Detectives, and FBI Agents that are similarly reviewing footage that was obtained.

A review of camera footage indicated that a white sedan, hereafter "Suspect Vehicle 1", was observed traveling westbound in the 700 block of Indian Hills Drive in Moscow at

approximately 3:26 a.m and westbound on Styner Avenue at Idaho State Highway 95 in Moscow at approximately 3:28 a.m. On this video, it appeared Suspect Vehicle 1 was not displaying a front license plate.

A review of footage from multiple videos obtained from the King Road Neighborhood showed multiple sightings of Suspect Vehicle 1 starting at 3:29 a.m. and ending at 4:20 a.m. These sightings show Suspect Vehicle 1 makes an initial three passes by the 1122 King Road residence and then leave via Walenta Drive. Based off of my experience as a Patrol Officer this is a residential neighborhood with a very limited number of vehicles that travel in the area during the early morning hours. Upon review of the video there are only a few cars that enter and exit this area during this time frame.

Suspect Vehicle 1 can be seen entering the area a fourth time a approximately 4:04 a.m. It can be seen driving eastbound on King Road, stopping and turning around in front of 500 Queen Road #52 and then driving back westbound on King Road. When Suspect Vehicle 1 is in front of the King Road Residence, it appeared to unsuccessfully attempt to park or turn around in the road. The vehicle then continued to the intersection of Queen Road and King Road where it can be seen completing a three-point turn and then driving eastbound again down Queen Road.

Suspect Vehicle 1 is next seen departing the area of the King Road Residence at approximately 4:20 a.m. at a high rate of speed. Suspect Vehicle 1 is next observed traveling southbound on Walenta Drive. Based on my knowledge of the area and review of camera footage in the neighborhood that does not show Suspect Vehicle 1 during that timeframe, I believe that Suspect Vehicle 1 likely exited the neighborhood at Palouse River Drive and Conestoga Drive. Palouse River Drive is at the southern edge of Moscow and proceeds into Whitman County, Washington. Eventually the road leads to Pullman, Washington. Pullman Washington is

approximately 10 miles from Moscow, Idaho. Both Pullman and Moscow are small college towns and people commonly travel back and forth between them.

Law enforcement officers provided video footage of Suspect Vehicle 1 to forensic examiners with the Federal Bureau of Investigation that regularly utilize surveillance footage to identify the year, make, and model of an unknown vehicle that is observed by one or more cameras during the commission of a criminal offense. The Forensic Examiner has approximately 35 years law enforcement experience with twelve years at the FBI. His specific training includes identifying unique characteristics of vehicles, and he uses a database that gives visual clues of vehicles across states to identify differences between vehicles.

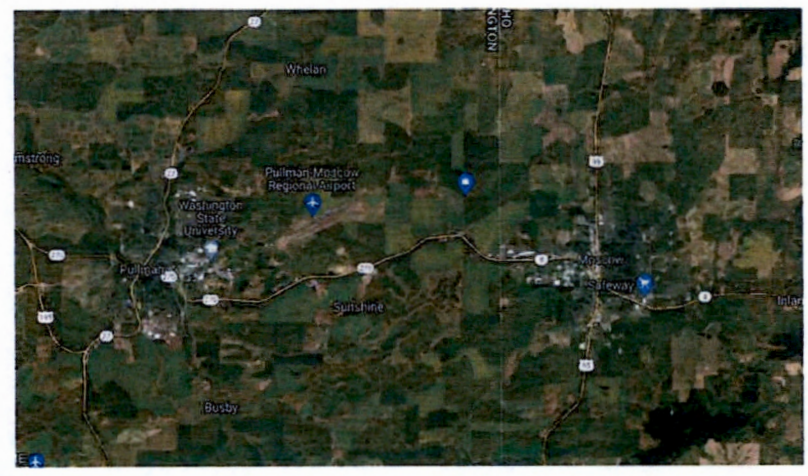
After reviewing the numerous observations of Suspect Vehicle 1, the forensic examiner initially believed that Suspect Vehicle 1 was a 2011-2013 Hyundai Elantra. Upon further review, he indicated it could also be a 2011-2016 Hyundai Elantra. As a result, investigators have been reviewing information on persons in possession of a vehicle that is a 2011-2016 white Hyundai Elantra.

Investigators were given access to video footage on the Washington State University (WSU) campus located in Pullman, WA. A review of that video indicated that at approximately 2:44 a.m. on November 13, 2022, a white sedan, which was consistent with the description of the White Elantra known as Suspect Vehicle 1, was observed on WSU surveillance cameras travelling north on southeast Nevada Street at northeast Stadium Way. At approximately 2:53 a.m., a white sedan, which is consistent with the description of the White Elantra known as Suspect Vehicle 1, was observed traveling southeast on Nevada Street in Pullman, WA towards SR 270. SR 270 connects Pullman, Washington to Moscow, Idaho. This camera footage from

Pullman, WA was provided to the same FBI Forensic Examiner. The Forensic Examiner identified the vehicle observed in Pullman, WA as being a 2014-2016 Hyundai Elantra.

At approximately 5:25 a.m., a white sedan, which was consistent with the description of Suspect Vehicle 1, was observed on five cameras in Pullman, WA and on WSU Campus cameras. The first camera that recorded the white sedan was located at 1300 Johnson Road in Pullman. The white sedan was observed traveling northbound on Johnson Road. Johnson Road leads directly back to West Palouse River Drive in Moscow which intersects with Conestoga Drive. The white sedan was then observed turning north on Bishop Boulevard and northwest on SR 270. At approximately 5:27 a.m., the White Elantra was observed on cameras traveling northbound on Stadium Way at Nevada Street, Stadium Way at Grimes Way, Stadium Drive at Wilson Road, and Stadium Way at Cougar Way.

Depiction showing Moscow and Pullman:



Depiction showing White Elantra's path of travel (not to scale):

On November 25, 2022, MPD asked area law enforcement agencies to be on the lookout for white Hyundai Elantras in the area. On November 29, 2022, at approximately 12:28 a.m., Washington State University (WSU) Police Officer Daniel Tiergo, [illegible] white Elantras registered at WSU. As a result of that query he located a 2015 white Elantra with Pennsylvania license plate LPZ-8649. This vehicle was registered to Bryan Kohberger hereafter "Kohberger" residing at 1630 NE Valley Road, Apartment 201, Pullman, Washington. 1630 NE Valley Road, is approximately three-quarters of a mile from the intersection of Stadium Way and Cougar Way (last camera location that picked up the white Elantra).

That same day at approximately 12:58 a.m., WSU Officer Chris Whitman was looking for white Hyundai Elantras and located a 2015 white Hyundai Elantra at 1630 NE Valley Road in Pullman in the parking lot. 1630 NE Valley Road, is an apartment complex that houses WSU

students. Officer Whitman also ran the car and it returned to Kohberger with a Washington tag. I reviewed Kohberg's WA state driver license information and photograph. This license indicates that Kohberger is a white male with a height of 6' and weighs 185 pounds. Additionally, the photograph of Kohberger shows that he has bushy eyebrows. Kohberger's physical description is consistent with the description of the male D.M. saw inside the King Road Residence on November 13th.

Further investigation, including a review of Latah County Sheriff's Deputy CPL Duke's body cam and reports, showed that on August 21, 2022, Bryan Kohberger was detained as part of a traffic stop that occurred in Moscow, Idaho, by CPL Duke. At the time, Kohberger, who was the sole occupant, was driving a white 2015 Hyundai Elantra with Pennsylvania plate LFZ-8649 which was set to expire on November 30, 2022. During the stop, which was recorded via a law enforcement body camera, Kohberger provided his phone number as 509-592-8458, hereafter the "8458 Phone" as his cellular telephone number. Investigators conducted electronic database queries and learned that the 8458 Phone is a number issued by AT&T.

On October 14, 2022, Bryan Kohberger was detained as part of a traffic stop by a WSU Police Officer. Upon review of that body cam and report of the stop, Kohberger was the sole occupant and was driving a white 2015 Hyundai Elantra with Pennsylvania plate LFZ-8649.

On November 18, 2022, according to WA state licensing, Kohberger registered the 2015 white Elantra with WA and later received WA plate CFB-8708. Prior to this time, the 2015 white Elantra was registered in Pennsylvania, which does not require a front license plate to be displayed (this was learned through communications with a Pennsylvania officer who is currently certified in the State of Pennsylvania). Based on my own experience and

communication with Washington law enforcement, I know that Idaho and Washington require front and back license plates to be displayed.

Investigators believe that Kohberger is still driving the 2015 white Elantra because his vehicle was captured on December 13, 2022, by a license plate reader in Loma, Colorado (information provided by a query to a database). Kohberger's Elantra was then queried on December 15, 2022 by law enforcement in Hancock County, Indiana. On December 16, 2022 at approximately 2:26 p.m., surveillance video showed Kohberger's Elantra in Albrightsville, Pennsylvania. The sole occupant of the vehicle was a white male whose description was consistent with Kohberger. Kohberger has family in Albrightsville, Pennsylvania (learned through a TLO search and locate tool database query).

Based on information provided on the WSU website, Kohberger is currently a Ph.D Student in Criminology at Washington State University. Pursuant to records provided by a member of the interview panel for Pullman Police Department, we learned that Kohberger's past education included undergraduate degrees in psychology and cloud-based forensics. These records also showed Kohberger wrote an essay when he applied for an internship with the Pullman Police Department in the fall of 2022. Kohberger wrote in his essay he had interest in assisting rural law enforcement agencies with how to better collect and analyze technological data in public safety operations. Kohberger also posted a Reddit survey which can be found by an open-source internet search. The survey asked for participants to provide information to "understand how emotions and psychological traits influence decision making when committing a crime."

As part of this investigation, law enforcement obtained search warrants to determine cellular devices that utilized cellular towers in close proximity to the King Road Residence on

November 13, 2022 between 3:00 a.m. and 5:00 a.m. After determining that Kohberger was associated to both the 2015 White Elantra and the 8458 Phone, investigators reviewed these search warrant returns. A query of the 8458 Phone in these returns did not show the 8458 Phone utilizing cellular tower resources in close proximity to the King Road Residence between 3:00 a.m. and 5:00 a.m.

Based on my training, experience, and conversations with law enforcement officers that specialize in the utilization of cellular telephone records as part of investigations, individuals can either leave their cellular telephone at a different location before committing a crime or turn their cellular telephone off prior to going to a location to commit a crime. This is done by subjects in an effort to avoid alerting law enforcement that a cellular device associated with them was in a particular area where a crime is committed. I also know that on numerous occasions, subjects will surveil an area where they intend to commit a crime prior to the date of the crime. Depending on the circumstances, this could be done a few days before or for several months prior to the commission of a crime. During these types of surveillance, it is possible that an individual would not leave their cellular telephone at a separate location or turn it off since they do not plan to commit the offense on that particular day.

On December 23, 2022, I applied for and was granted a search warrant for historical phone records between November 12, 2022 at 12:00 a.m. and November 14, at 12:00 a.m. for the 8458 Phone held by the phone provider AT&T (approximately 24 hours proceeding and following the times of the homicides).

On December 23, 2022, pursuant to that search warrant, I received records for the 8458 Phone from AT&T. These records indicated that the 8458 Phone is subscribed to Bryan Kohberger at an address in Albrightsville, Pennsylvania and the account has been open since

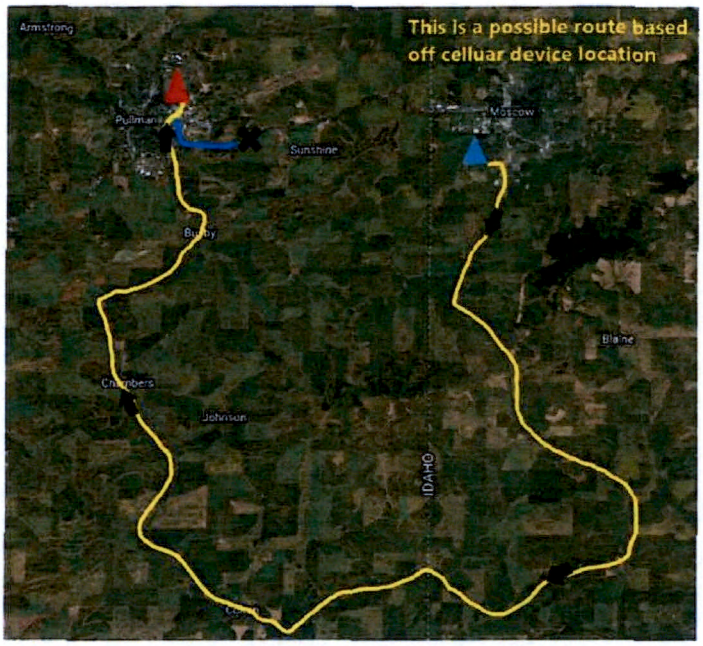
June 23, 2022. These records also included historical cell site location information (CSLI) for the 8458 Phone. After receiving this information, I consulted with an FBI Special Agent (SA) that is certified as a member of the Cellular Analysis Survey Team (CAST). Members of CAST are certified with the FBI to provide expert testimony in the field of historical CSLI and are required to pass extensive training that includes both written and practical examinations prior to be certified with CAST as well as the completion of yearly certification requirements. Additionally, the FBI CAST SA that I consulted with has over fifteen years of federal law enforcement experience, which includes six years with the FBI. From information provided by CAST, I was able to determine estimated locations for the 8458 Phone from November 12, 2022 to November 13, 2022, the time period authorized by the court.

On November 13, 2022 at approximately 2:42 a.m., the 8458 Phone was utilizing cellular resources that provide coverage to 1630 Northeast Valley Road, Apt G201, Pullman, WA, hereafter the "Kohberger Residence." At approximately 2:47 a.m., the 8458 Phone utilized cellular resources that provide coverage southeast of the Kohberger Residence consistent with the 8458 Phone leaving the Kohberger Residence and traveling south through Pullman, WA. This is consistent with the movement of the white Elantra. At approximately 2:47 a.m. the 8458 Phone stops reporting to the network, which is consistent with either the phone being in an area without cellular coverage, the connection to the network is disabled (such as putting the phone in airplane mode), or that the phone is turned off. The 8458 Phone does not report to the network again until approximately 4:48 a.m. at which time it utilized cellular resources that provide coverage to ID state highway 95 south of Moscow, ID near Blaine, ID (north of Genesee). Between 4:50 a.m. and 5:26 a.m., the phone utilizes cellular resources that are consistent with the 8458 Phone traveling south on ID state highway 95 to Genesee, ID, then traveling west towards

Uniontown, ID, and then north back into Pullman, WA. At approximately 5:30 a.m., the 8458 Phone is utilizing resources that provide coverage to Pullman, WA and consistent with the phone traveling back to the Kohberger Residence. The 8458 Phone's movements are consistent with the movements of the white Elantra that is observed traveling north on Stadium Drive at approximately 5:27 a.m. Based on a review of the 8458 Phone's estimated locations and travel, the 8458 Phone's travel is consistent with that of the white Elantra.

Further review indicated that the 8458 Phone utilized cellular resources on November 13, 2022 that are consistent with the 8458 Phone leaving the area of the Kohberger Residence at approximately 9:00 a.m. and traveling to Moscow, ID. Specifically, the 8458 Phone utilized cellular resources that would provide coverage to the King Road Residence between 9:12 a.m. and 9:21 a.m. The 8458 Phone next utilized cellular resources that are consistent with the 8458 Phone traveling back to the area of the Kohberger Residence and arriving to the area at approximately 9:32 a.m.

Below is a depiction (not to scale) of the possible route taken based off of cellular site locations:



Investigators found that the 8458 Phone did connect to a cell phone tower that provides service to Moscow on November 14, 2022, but investigators do not believe the 8458 Phone was in Moscow on that date. The 8458 Phone has not connected to any towers that provide service to Moscow since that date.

Based on my training, experience, and the facts of the investigation thus far, I believe that Kohberger, the user of the 8458 Phone, was likely the driver of the white Elantra that is observed departing Pullman, WA and that this vehicle is likely Suspect Vehicle 1. Additionally, the route of travel of the 8458 Phone during the early morning hours of November 13, 2022 and the lack of the 8458 Phone reporting to AT&T between 2:47 a.m. and 4:48 a.m. is consistent with Kohberger attempting to conceal his location during the quadruple homicide that occurred at the King Road Residence.

On December 23, 2022, I was granted a search warrant for Kohberger's historical CSLI from June 23, 2022 to current, prospective location information, and a Pen Register/Trap and Trace on the 8458 Phone to aid in efforts to determine if Kohberger stalked any of the victims in this case prior to the offense, conducted surveillance on the King Road Residence, was in contact with any of the victims' associates before or after the alleged offense, any locations that may contain evidence of the murders that occurred on November 13, 2022, the location of the white Elantra registered to Kohberger, as well as the location of Kohberger.

On December 23, 2022 pursuant to that search warrant, I received historical records for the 8458 Phone from AT&T from the time the account was opened in June 2022. After consulting with CAST SA, I was able to determine estimated locations for the 8458 Phone from June 2022 to present, the time period authorized by the court. The records for the 8458 Phone show the 8458 Phone utilizing cellular resources that provide coverage to the area of 1122 King Road on at least twelve occasions prior to November 13, 2022. All of these occasions, except for one, occurred in the late evening and early morning hours of their respective days.

One of these occasions, on August 21, 2022, the 8458 Phone utilized cellular resources providing coverage to the King Road Residence from approximately 10:34 p.m. to 11:35 p.m. At approximately 11:37 p.m., Kohberger was stopped by Latah County Sheriff's Deputy CPL Duke, as mentioned above. The 8548 Phone was utilizing cellular resources consistent with the location of the traffic stop during this time (Farm Road and Pullman Highway).

Further analysis of the cellular data provided showed the 8458 Phone utilized cellular resources on November 13, 2022 consistent with the Phone travelling from Pullman, Washington to Lewiston, Idaho via US Highway 195. At approximately 12:36 p.m., the 8458 Phone utilized cellular resources that would provide coverage to Kate's Cup of Joe coffee stand located at 810

Port Drive, Clarkston, WA. Surveillance footage from the US Chef's Store located at 820 Port Drive, Clarkston, WA and adjacent to Kate's Cup of Joe showed a white Elantra consistent with Suspect Vehicle 1 drive past Kate's Cup of Joe at a time consistent with the cellular data from the 8548 Phone.

At approximately 12:46 p.m. the 8458 Phone then utilized cellular data in the area of the Albertson's grocery store at 400 Bridge Street in Clarkston, Washington. Surveillance footage obtained from the Albertson's showed Kohberger exit the white Elantra, consistent with Suspect Vehicle 1, at approximately 1:49 p.m. Interior surveillance cameras showed Kohberger walk through the store, purchase unknown items at the checkout, and leave at approximately 1:54 p.m. Kohberger's possible path of travel is depicted below (not to scale).

Additional analysis of records for the 8458 Phone indicated that between approximately 5:32 p.m. and 5:36 p.m., the 8458 Phone utilized cellular resources that provide coverage to Johnson, ID. The 8458 Phone then stops reporting to the network from approximately 5:36 p.m. to 8:30 p.m. That is consistent with the 8458 Phone being the area that the 8458 Phone traveled in the hours immediately following the suspected time the homicides occurred.

On December 27, 2022, Pennsylvania Agents recovered the trash from the Kohberger family residence located in Albrightsville, PA. That evidence was sent to the Idaho State Lab for testing. On December 28, 2022, the Idaho State Lab reported that a DNA profile obtained from the trash and the DNA profile obtained from the sheath, identified a male as not being excluded as the biological father of Suspect Profile. At least 99.9998% of the male population would be expected to be excluded from the possibility of being the suspect's biological father.

Based on the above information, I am requesting an arrest warrant be issued for Bryan C. Kohberger, (DOB) 11/21/1994, for Burglary at 1122 King Street in Moscow, Idaho, and four counts of Murder in the First Degree for the murders of Madison Mogen, Kaylee Goncalves, Xana Kernodle, and Ethan Chapin.

I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

12/29/2022
Date

#157
Affiant

FEDERAL BUREAU OF INVESTIGATION

OFFICIAL RECORD

Date of entry 05/01/2023

Through the course of this investigation investigators performed an extensive canvas of Moscow, Idaho (ID) and the surrounding areas, to include Pullman, Washington (WA), Clarkston, WA and Lewiston, ID, for video surveillance which may have been relevant to this investigation. The surveillance which was collected was reviewed by Special Agent (SA) Hille in conjunction with other investigative leads in an attempt to identify and locate a suspect and/or suspect vehicle.

Through this surveillance review and a review of other investigative leads a suspect vehicle identified as a 2011 - 2016 white Hyundai Elantra (hereafter referred to as "Vehicle 1"). Additionally, a subject was identified as Bryan KOHBERGER.

The following is intended to be a summary of the collected surveillance footage, highlighting pertinent sightings, which appear to show vehicles matching the description of Vehicle 1 or sightings of individuals matching The description of KOHBERGER on November 13, 2023.

The below noted camera locations were checked for their time stamp accuracy as compared to actual current time. The following time accuracy was found for each location:

787 Indian Hills Drive, Moscow, Idaho - Camera time accurate to local time.

763 Indian Hills Drive, Moscow, Idaho - Camera time accurate to local time.

755 Indian Hills Drive, Moscow, Idaho - Camera time accurate to local time.

1311 S Main Street, Moscow, ID - Camera time approximately one minute and 43 seconds behind local time.

1125 Ridge Road, Apt 108, Moscow, ID - Camera time accurate to local time.

1320 Linda Lane, Moscow, ID, 1320 Dumpster - Camera time approximately five seconds behind local time.

1112 King Road, Moscow, ID - Camera time accurate to local time.

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1330 Linda Lane, Moscow, ID 1330 PARKING - Camera time accurate to local time.

451 Paradise Drive, Moscow, ID - Camera time accurate to local time.

1455 SE Bishop Blvd, Pullman, WA, CH 10, Pullman, WA - Camera time approximately seven seconds behind local time.

NE Stadium Way at SE Nevada, Pullman, WA [Washington State University (WSU)] - Camera time accurate to local time.

NE Stadium Way at Grimes, Pullman, WA (WSU) - Camera time accurate to local time.

NE Stadium Way at Wilson Rd, Pullman, (WSU) WA - Camera time accurate to local time.

NE Stadium, Way at Cougar Way, Pullman, (WSU) WA - Camera time accurate to local time.

301 5th Street, Clarkston, WA (Costco) - Camera time accurate to local time.

820 Port Drive, Clarkston, WA (U.S. Chef Store) - Camera time approximately one minute behind local time.

400 Bridge Street, Clarkston, WA (Albertson's) - Camera time accurate to local time within one minute.

1300 Johnson Avenue, Pullman, WA (E&S Services) - Camera time is approximately one minute and 30 seconds behind local time.

The following is intended as a summary of the collected surveillance footage and is not intended to be an all-encompassing report on the entirety of the collected video.

[Agent Note: For a visual representation of the sightings listed below, maps have been provided as reference documents. For the Indian Hills addresses below, please refer to "Map 1." For the remainder of the addresses in Moscow, ID, please refer to "Map 2" Digital copies of Map 1 and Map 2 will be attached to the 1A section of the case file.]

Time: **Date:** **Location:**

Sightings in the Moscow, ID / Pullman, WA area:

03:26:10 a.m. November 13, 2022 787 Indian Hills Drive, Moscow, Idaho

Summary: A vehicle matching the description of Vehicle 1 is seen driving westbound on Indian Hills Drive.

3:26:35 a.m. November 13, 2022 763 Indian Hills Drive, Moscow, Idaho

Summary: The headlights of a vehicle are seen traveling westbound on Indian Hills Drive.

3:26:43 a.m. November 13, 2022 755 Indian Hills Drive, Moscow, Idaho

Summary: A vehicle matching the description of Vehicle 1 is seen traveling westbound on Indian Hills Drive.

3:28:56 a.m. November 13, 2022 1311 S Main Street, Moscow, ID, Channel 7

Summary: A vehicle matching the description of Vehicle 1 is seen traveling westbound on Styner Avenue crossing Main Street and continuing westbound onto Lauder Avenue.

3:29:02 a.m. November 13, 2022 1125 Ridge Road, Apt 108, Moscow, ID, Camera 2

Summary: A vehicle matching the description of Vehicle 1 is seen traveling westbound on Lauder Avenue through the intersection of Lauder Avenue / Ridge Road.

3:29:04 a.m. November 13, 2022 1125 Ridge Road, Apt 108, Moscow, ID, Camera 1

Summary: A vehicle matching the description of Vehicle 1 continues on Lauder Avenue as the road curves to the north toward Taylor Avenue.

3:29:48 a.m. November 13, 2022 1320 Linda Lane, Moscow, ID, 1320 Dumpster

Summary: A vehicle matching the description of Vehicle 1 is seen traveling westbound on Taylor Ave past Linda Lane.

3:30:22 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 is seen traveling southbound on King Road, turning east onto Queen Road.

3:30:55 a.m. November 13, 2022 1330 Linda Lane, Moscow, ID
1330 PARKING

Summary: A vehicle matching the description of Vehicle 1 travels east along the north side of 500 Queen Road. The vehicle turns south along the east side of the building then turns west along the south side of the building. The vehicle matching the description of Vehicle 1 exits the frame traveling west in the direction of 1122 King Road, Moscow, ID. (Hereafter referred to as "the victims' residence.")

3:31:18 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights briefly shine on upper exterior of 1127 King Road indicating a vehicle turning north toward Queen Road from the southern parking area of 500 Queen Road.

3:33:01 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels westbound on Queen Road turning north onto King Road. Headlights can be seen shining on trees to the west of the intersection of King Road and Taylor Avenue, indicating the vehicle turned west onto Taylor Avenue.

3:33:36 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen southbound on Walenta Drive behind 1119 King Road Drive.

3:35:13 a.m. November 13, 2022 451 Paradise Drive, Moscow, ID, Shop

Summary: A vehicle matching the description of Vehicle 1 travels south on Ridge Road turning westbound onto Paradise Drive.

3:35:14 a.m. November 13, 2022 451 Paradise Drive, Moscow, ID, Front Door

Summary: A vehicle matching the description of Vehicle 1 continues westbound on Paradise Drive.

3:38:12 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen northbound on Walenta Drive behind 1119 King Road Drive.

3:38:34 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 is seen southbound on King Road turning east on Queen Road

3:39:07 a.m. November 13, 2022 1330 Linda Lane, Moscow, ID, 1330 PARKING

Summary: A vehicle matching the description of Vehicle 1 travels east on Queen Road along the north side of 500 Queen Road. The vehicle turns south along the east side of the building then turns west along the south side of the building. The vehicle matching the description of Vehicle 1 exits the frame traveling west in the direction of the victims' residence.

3:39:35 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights briefly shine on upper exterior of 1127 King Road indicating a vehicle turning north toward Queen Road from the southern parking area of 500 Queen Road.

3:40:24 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 is seen traveling west on Queen Road, turning north onto King Road. Headlights can be seen shining on trees to the west of the intersection of King Road and Taylor Avenue, indicating the vehicle turned west onto Taylor Avenue.

3:41:01 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

3:43:46 a.m. November 13, 2022 451 Paradise Drive, Moscow, ID, Shop

Summary: Vehicle headlights turn east onto Paradise Drive from Ridge Road. A reflection of the headlights indicates the vehicle may have made an immediate U-turn back onto Ridge Road, northbound.

3:45:07 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling north on Walenta Drive behind 1119 King Road.

3:47:08 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

3:48:47 a.m. November 13, 2022 451 Paradise Drive, Moscow, ID, Shop

Summary: A vehicle matching the description of Vehicle 1 turns east onto Paradise Drive from Ridge Road. A reflection of headlights indicate the vehicle may have made an immediate U-turn back onto Ridge Road northbound.

3:50:27 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling north on Walenta Drive behind 1119 King Road.

3:51:26 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

3:52:42 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

3:53:36 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling north on Walenta Drive behind 1119 King Road.

3:56:24 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels south on King Road and turns east onto Queen Road.

3:56:57 a.m. November 13, 2022 1330 Linda Lane, Moscow, ID,

1330 PARKING

Summary: A vehicle matching the description of Vehicle 1 travels east along the north side of 500 Queen Road. The vehicle turns south along the east side of the building then turns west along the south side of the building. The vehicle matching the description of Vehicle 1 exits the frame traveling west in the direction of the victims' residence.

3:57:27 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights briefly shine on the upper exterior of 1127 King Road indicating a vehicle turning north toward Queen Road; the headlights disappear approximately 5 seconds later.

3:58:23 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels west on Queen Road and turns north onto King Road. Headlights can be seen shining on trees to the west of the intersection of King Road and Taylor Avenue, indicating the vehicle turned west onto Taylor Avenue.

3:59:04 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

4:00:14 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling north on Walenta Drive behind 1119 King Road.

4:01:30 a.m. November 13, 2022 1125 Ridge Road, Apt 108, Moscow, ID Camera 1

Summary: A vehicle matching the description of Vehicle 1 travels south then east on Lauder Avenue.

4:01:43 a.m. November 13, 2022 1125 Ridge Road, Apt 108, Moscow, ID Camera 2

Summary: A vehicle matching the description of Vehicle 1 turns from eastbound Lauder Avenue onto southbound Ridge Road.

4:04:20 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling north on Walenta Drive behind 1119 King Road.

4:04:56 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels south on King Road and turns east onto Queen Road.

4:05:31 a.m. November 13, 2022 1330 Linda Lane, Moscow, ID, 1330 PARKING

Summary: A vehicle matching the description of Vehicle 1 pulls partially into east-side parking lot of the 500 Queen Road apartment buildings (from north side of the buildings, moving east). The vehicle matching the description of Vehicle 1 then completes a three-point turn, and returns westbound (along north side of apartment buildings).

4:06:09 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are visible in a window reflection, as well as on the exterior of 1119 King Road; indicating the vehicle is facing west on Queen Road. The lights appear to move slowly indicating the vehicle is descending the hill while passing by the front of the victim's residence

4:06:31 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels west on

Queen Road, performs a U-Turn at the intersection with King Road then travels east on Queen Road.

4:07:28 a.m. November 13, 2022 1330 Linda Lane, Moscow, ID, 1330 PARKING

Summary: A vehicle matching the description of Vehicle 1 travels east along the north side of 500 Queen Road. The vehicle turns south along the east side of the building then turns west along the south side of the building. The vehicle matching the description of Vehicle 1 exits the frame traveling west in the direction of the victims' residence.

4:07:47 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights of a vehicle turning north onto Queen Road briefly shine on exterior of 1127 King Road. There is no subsequent vehicle activity captured for approximately 13 minutes after these headlights are seen.

4:20:47 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: A vehicle matching the description of Vehicle 1 travels westbound on Queen Road at a high rate of speed, turning north onto King Road. Headlights can be seen shining on trees to the west of the intersection of King Road and Taylor Avenue, indicating the vehicle turned west onto Taylor Avenue.

4:21:05 a.m. November 13, 2022 1112 King Road, Moscow, ID

Summary: Headlights are seen traveling south on Walenta Drive behind 1119 King Road.

05:26:59 a.m. November 13, 2022 1300 Johnson Avenue, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 is seen traveling northbound on Johnson Avenue.

[Agent Note: Due to the speed of the vehicle and its distance from the camera, the vehicle matching the description of Vehicle 1 is difficult to identify. However, this vehicle is seen driving northbound on Bishop Boulevard, followed shortly after by a semi-truck. Moments later the white sedan is seen on the following cameras, still followed by the semi-truck.]

[Agent Note: The camera at 1330 Johnson Avenue shows two separate roads, Johnson Avenue and Bishop Boulevard. Johnson Avenue is in the foreground and Bishop Boulevard is in the background. In this surveillance the vehicle matching Vehicle 1 is seen on Johnson Avenue while the semi-truck traveling behind the vehicle is on Bishop Boulevard.]

[Agent Note: Actual time, with time stamp offset is approximately 05:25:29.]

05:25:30 a.m. November 13, 2022 1455 SE Bishop Boulevard, Pullman, WA, CH 10

Summary: A vehicle matching the description of Vehicle 1 is seen turning from northbound Johnson Ave onto northbound Bishop Boulevard and continues northbound.

[Agent Note: This time is approximate, determined by time comparison with other cameras at the same business, due to frame glitches in the surveillance footage.]

5:26:22 a.m. November 13, 2022 1455 SE Bishop Boulevard, Pullman, WA, CH 14

Summary: A vehicle matching the description of Vehicle 1 is seen traveling northbound Bishop Boulevard toward E Main Street (Highway 270).

5:26:46 a.m. November 13, 2022 1455 SE Bishop Boulevard, Pullman, WA, CH 14

Summary: A vehicle matching the description of Vehicle 1 turns onto northbound E Main Street (Highway 270).

5:28:31 a.m. November 13, 2022 NE Stadium Way at SE Nevada

Street, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 is seen turning onto NE Stadium Way from E Main Street (Highway 270). Vehicle 1 continues northeast through the intersection.

5:28:44 a.m. November 13, 2022 NE Stadium Way at SE Nevada Street, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 continues northeast on NE Stadium Way through the intersection.

5:29:33 a.m. November 13, 2022 NE Stadium Way at Grimes Way, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 continues north on NE Stadium Way through the intersection.

5:29:41 a.m. November 13, 2022 NE Stadium Way at Wilson Road, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 continues north on NE Stadium Way through the intersection.

5:30:18 a.m. November 13, 2022 NE Stadium Way at Cougar Way, Pullman, WA

Summary: A vehicle matching the description of Vehicle 1 is northbound on NE Stadium Way then turns eastbound onto NE Orchard Drive.

9:12:59 a.m. November 13, 2022 1311 S Main Street, Moscow, ID, Channel 1

Summary: A vehicle matching the description of Vehicle 1 is seen traveling southbound on Highway 95.

Sightings in Clarkston, WA

12:34:15 p.m. November 13, 2022 301 5th Street, Clarkston, WA (Costco), Entry Roll Up

Summary: An individual matching the description of KOHBERGER enters the main entrance to Costco. The individual appears to approach the front door from the northeast portion of the parking lot.

12:34:57 p.m. November 13, 2022 301 5th Street, Clarkston, WA (Costco), Entry Roll Up

Summary: An individual matching the description of KOHBERGER appears to be denied entry into Costco and leaves out the entrance and returns to the northeast section of the parking lot.

12:37:55 p.m. November 13, 2022 301 5th Street, Clarkston, WA (Costco), Gas Hut

Summary: A vehicle matching the description of Vehicle 1 is seen traveling westbound through the Costco parking lot.

12:38:12 p.m. November 13, 2022 301 5th Street, Clarkston, WA (Costco), Gas Hut

Summary: A vehicle matching the description of Vehicle 1 merges onto 5th Street northbound and immediately turns onto Port Drive toward Walmart.

12:42:35 p.m. November 13, 2022 820 Port Drive, Clarkston, WA, Lot North

Summary: A vehicle matching the description of Vehicle 1 travels westbound on Port Drive turning north into the Kate's Cup of Joe drive through lane.

12:42:56 p.m. November 13, 2022 820 Port Drive, Clarkston, WA, Lot North

Summary: A vehicle matching the description of Vehicle 1 performs a U-Turn into the U.S. Chef Store parking lot and slowly moves south through the lot.

12:43:41 p.m. November 13, 2022 820 Port Drive, Clarkston, WA, Lot North

Summary: A vehicle matching the description of Vehicle 1 continues south through the U.S. Chef Store parking lot until it leaves the frame. Vehicle 1 appears to turn east onto Port Drive as it drives away.

12:46:36 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Parking Lot West

Summary: A vehicle matching the description of Vehicle 1 is seen traveling east through the Albertson's parking lot eventually parking in the upper left corner of the screen, behind a pickup truck.

12:48:55 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Parking lot East

Summary: An individual matching the description of KOHBERGER walks from the area where the above-mentioned vehicle parked toward the east entrance to Albertson's.

12:49:30 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Exit East

Summary: An individual matching the description of KOHBERGER is seen entering Albertson's via the east entrance / exit.

12:56:50 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Exit East

Summary: An individual matching the description of KOHBERGER is seen checking out at the self-checkout.

12:58:01 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, East Exit

Summary: An individual matching the description of KOHBERGER is seen exiting the Albertson's via the east door.

12:58:37 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Parking Lot East

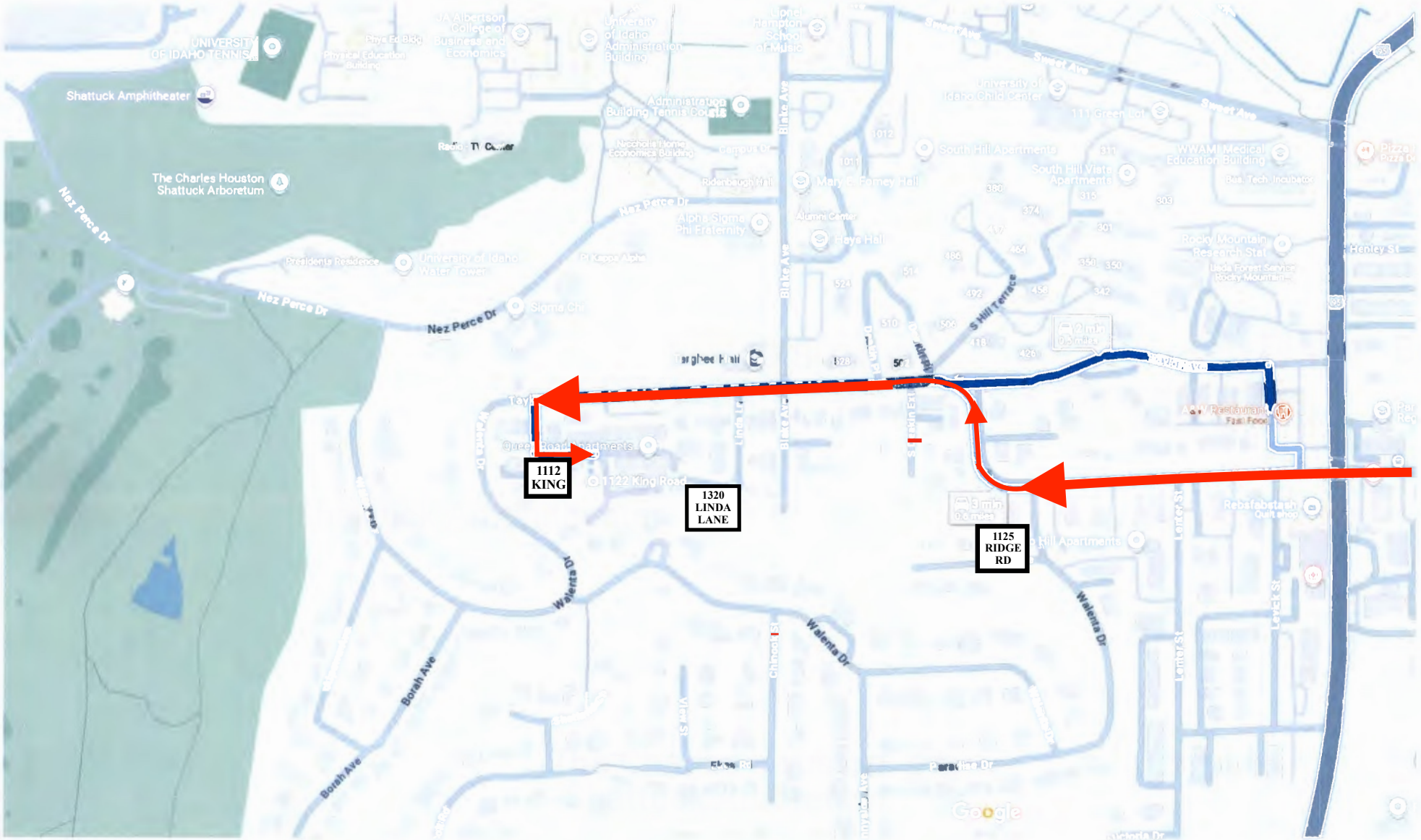
Summary: An individual matching the description of KOHBERGER returns to the area where the vehicle matching the description of Vehicle 1 previously parked.

01:04:16 p.m. November 13, 2022 400 Bridge Street, Clarkston, WA, Parking Lot West

Summary: A vehicle matching the description of Vehicle 1 drives south toward the parking lot exit to Bridge Street.

Through the course of this video review, clips showing vehicles matching the description of Vehicle 1 which were seen on the WSU surveillance cameras located along Stadium Way in Pullman, WA were collected from the live camera system by SA Hille. These clips were turned over to the Moscow Police Department for storage.

[Agent Note: Surveillance review on the WSU camera system was conducted using a live view system. Due to the functionality of the system, only small clips were able to be extracted and maintained. SA Hille reviewed the WSU cameras between approximately 2:00 a.m. and 6:00 a.m. on November 13, 2022 and collected clips which showed vehicles matching the description of Vehicle 1. These sightings are noted above. No other sightings of vehicles matching this description were observed.]



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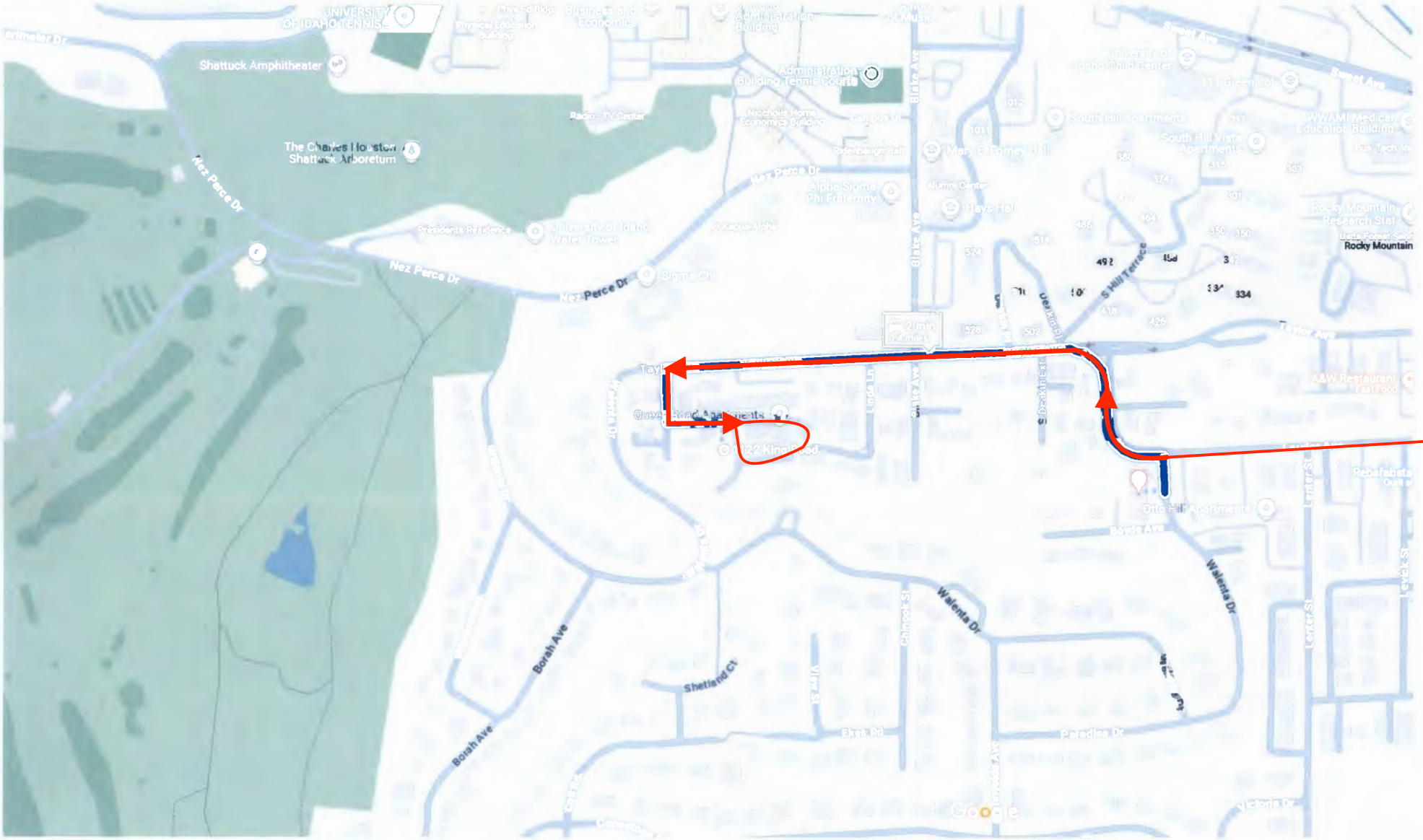


via Taylor Ave — 2 min
Fastest route — 0.4 mile

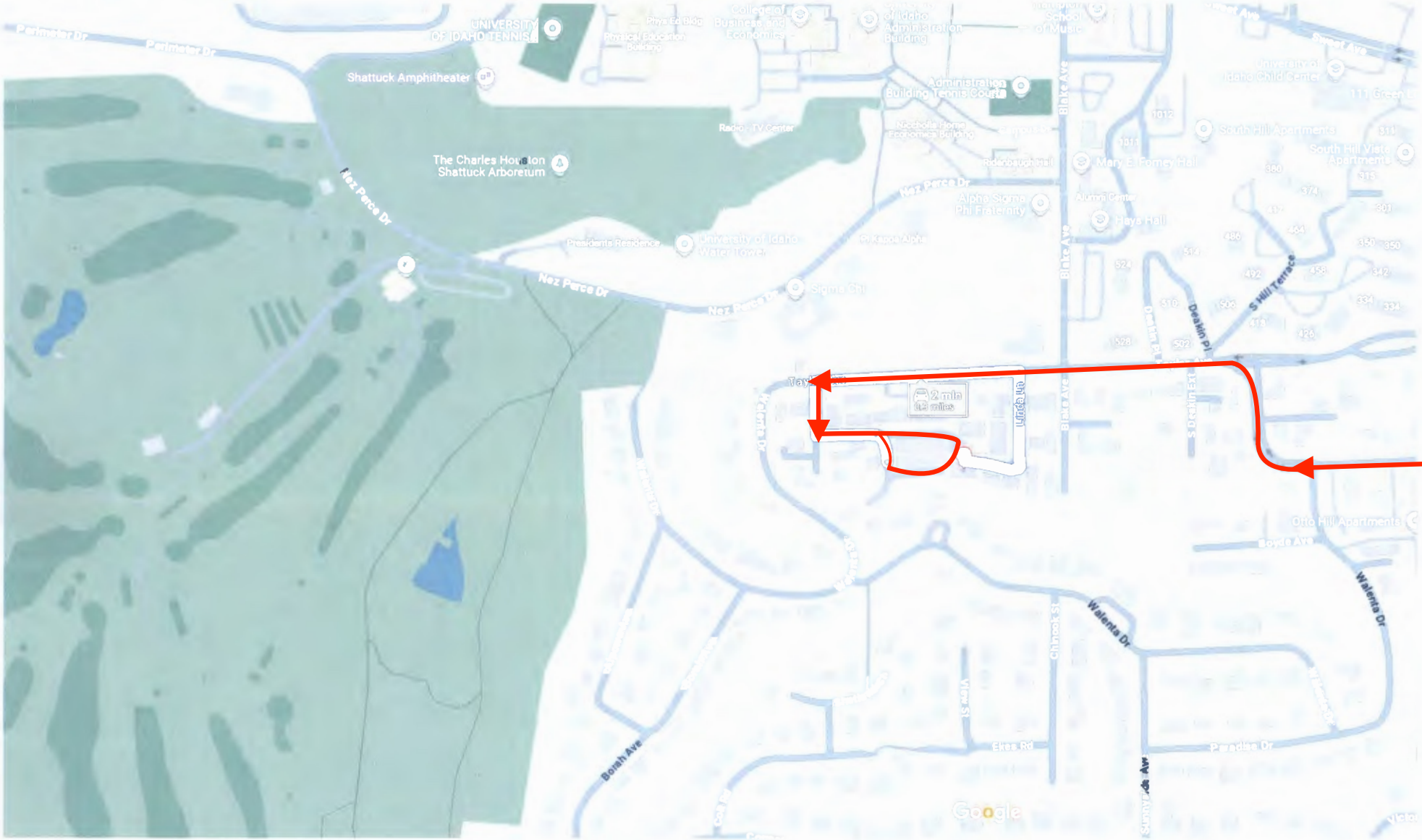
via Taylor Ave

1 min without traffic

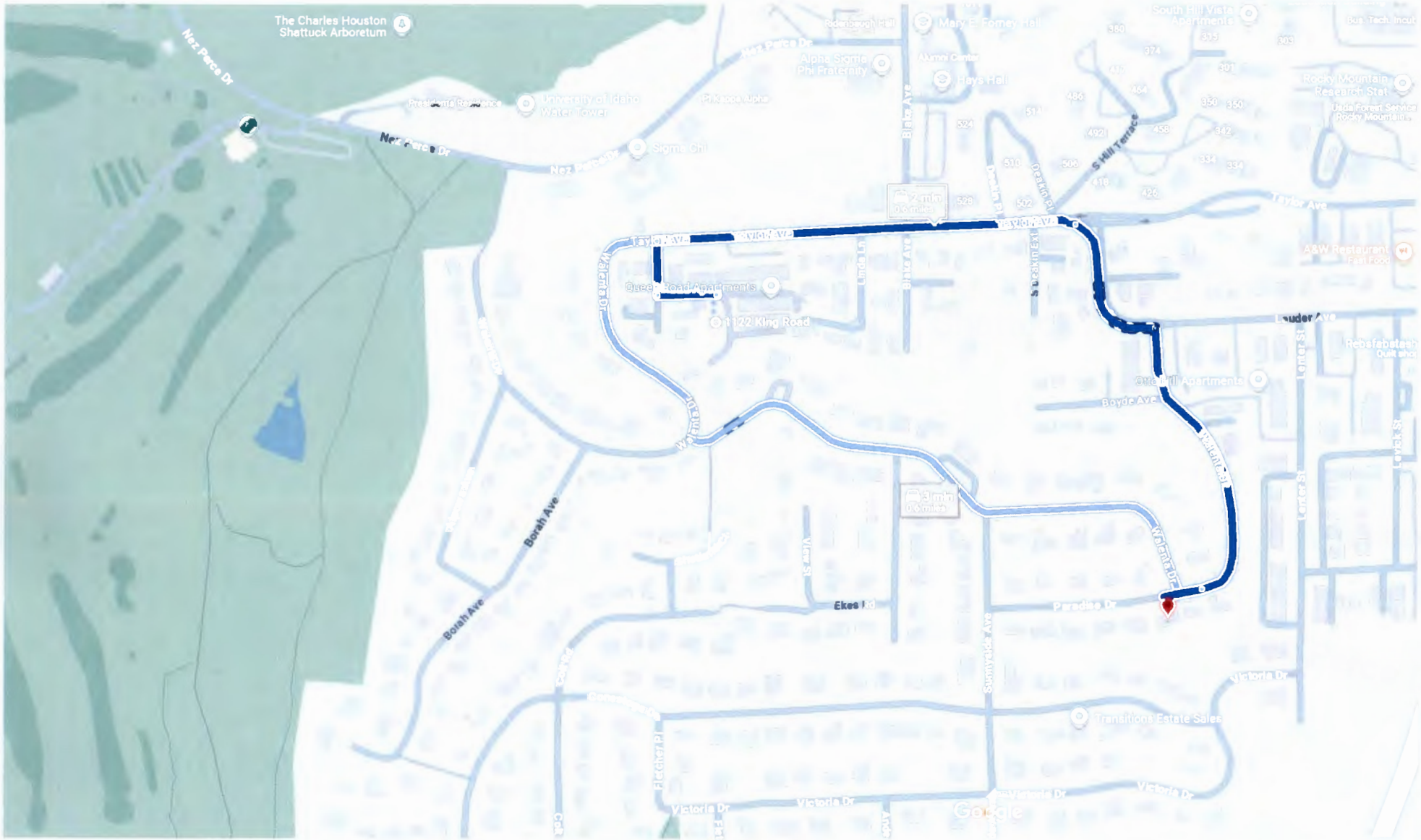
2 min

0.3 mile

Explore nearby 1320 Linda Ln


Palmeter Dr
UNIVERSITY OF IDAHO TENNIS
Shattuck Amphitheater
Physical Education Building
Administration Building
Tennis Courts
Radio TV Center
The Charles Houston Shattuck Arboretum
Nez Perce Dr
President's Residence
University of Idaho Water Tower
Sigma Chi
Alpha Sigma Phi Fraternity
Alumni Center
Haye Hall
Mary E. Forney Hall
South Hill Apartments
South Hill Vista Apartments
Blake Ave
S Hill Terrace
Deakin Pl
Taylor
2 min
0.2 miles
Linda Ln
Otto Hill Apartments
Boyd Ave
Walenta Dr
Paradise Dr
Elsea Rd
Bosh Ave
Google

Google Maps 1122 King Rd, Moscow, ID 83843 to 451 Paradise Dr, Moscow, ID 83843 Drive Route Map



Map data ©2025 Google 200 ft

via Taylor Ave and Walenta Dr Fastest route	2 min 0.6 mile	
via Walenta Dr	3 min	

Federal Bureau of Investigation
Digital Evidence Laboratory

ERF Building 27958A
Quantico, VA 22135

REPORT OF EXAMINATION

To: Salt Lake City
Travis Shirley

Date: March 21, 2023
Case ID: 356D-SU-3683464
Request No.: HQQ221220001

Request Date: December 14, 2022

Ref. No: N/A

Title: (U) Unknown Subject, Moscow Police Department assistance, Ethan Chapin - victim; Madison Mogen- victim; Xana Kernodle - Victim; Kayle Goncalves - Victim;

Date item(s) received: November 19, 2022; November 21, 2022; November 23, 2022; December 7, 2022; December 20, 2022

Item(s) submitted *(this report will only cover the following items)*:

HQQ_031715: 7 mp4 video files - Balcony Video depicting questioned vehicle, received 11/21/22 (Examined)

HQQ_031716: 5 MP4 videos and 2 WMV videos depicting questioned vehicle, received electronically on 11/19/22 (Examined)

HQQ_031718: 1 avi video file depicting questioned vehicle, received electronically on 12/7/22 (Examined)

HQQ_031717: Multiple images and videos depicting questioned vehicle, received electronically on 11/23/22 (Examined)

HQQ_031719: 3 avi videos and 2 word documents depicting questioned vehicle, received electronically on 12/20/22 (Examined)

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STATE'S EXHIBIT
S-4
CR01-24-31665
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Summary:

The Forensic Audio, Video and Image Analysis Program was requested to determine the make, model and year of the questioned vehicle depicted in the submitted media.

The submitted videos and images were electronically processed to identify the questioned vehicle's make, model and year. Seven vehicle make-model charts were produced. See the opinions section for the results of the examinations.

Details of Examination:

The dates of this examination were November 19, 2022 through March 21, 2023.

The submitted videos and images were electronically processed from which seven make-model charts were produced. The make/model charts were recorded to a DVD-R and labeled Examination Results Copy HQQ031720. Six copies of HQQ031720 were produced and six copies of the charts were printed. Reference media was recorded to a DVD-R and will be retained in the case file. The multiple submissions of media were reviewed independently and collectively to identify the questioned vehicle's make, model and year.

Opinions:

The submitted videos on November 19, 2022 and November 21, 2022 were reviewed to determine the questioned vehicle's make, model and year. Due to insufficient image detail and obscured views produced by the blooming of the vehicle's headlights the make, model and year could not be determined.

The submitted videos on November 23, 2022 were reviewed to determine the questioned vehicle's make, model and year. The questioned vehicle shares similar class characteristics with a 5th generation Hyundai Elantra between 2011-2013. The similar class characteristics include, but are not limited to, the overall body shape, window configuration, side trim, headlight shape, front grill configuration, and rear license plate position. On November 26, 2022, after reviewing expanded known information to include the rear bumper reflector and the shape of the front fog lights on the Hyundai Elantra the questioned vehicle's year was expanded to the 5th generation between 2011-2016.

The submitted video received on December 7, 2022 was reviewed to determine the questioned vehicle's make, model and year. Due to insufficient image detail the vehicle's make, model and year could not be determined.

The submitted videos and images on December 20, 2022 were reviewed to determine the questioned vehicle's make, model and year. The questioned vehicle shares similar class characteristics with a 5th

generation Hyundai Elantra between 2014-2016. The similar class characteristics include, but are not limited to, the overall body style, window configuration, front grill configuration, headlight shape, side trim, rear brake light configuration, rear license plate position, and rear bumper reflector position. The position of the rear bumper reflector and the shape of the fog lights assisted in narrowing the vehicle year span.

Derivative Evidence/Copies:

HQQ031720: DVD, Examination Results Copy containing vehicle make-model charts

Charts: 7 make-model charts (6 copies)

Copies of HQQ03170: 6 DVDs containing vehicle make-model charts

Reference Media: 1 DVD containing reference media

Disposition of Items:

Examination Results Copy HQQ031720, 6 copies of HQQ031720 and 6 copies of 7 vehicle make-model charts were forwarded to the Lewiston Resident Agency on March 8, 2023, via FedEx. 1 DVD containing reference media was retained in the case file.

Examiner: _____

Anthony R. Imel
Operational Technology Division
Forensic Audio, Video and Image Analysis Program

Make-Model Chart #3

Case #3560-SU-3683364
Lab #HQQ24220001 ADO
2/5/2025

Arriving

Departing

3rd Brake Light / Lower Window

2011–2016 Hyundai Elantra

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S-5
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